

JONES DAY

250 VESEY STREET • NEW YORK, NEW YORK 10281.1047
TELEPHONE: +1.212.326.3939 • FACSIMILE: +1.212.755.7306

DIRECT NUMBER: (212) 326-8338
MWLAMPE@JONESDAY.COM

JP608719

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VIA ECF

The Honorable Sarah L. Cave
United States Magistrate Judge

Re: Rusis v. International Business Machines Corp.
Docket No. 18-cv-8434 (S.D.N.Y.)

Dear Judge Cave:

Defendant International Business Machines Corp. (“Defendant”) respectfully requests leave to file the two-page letter attached hereto as Exhibit A, which contains supplemental authorities responding to the authority provided by Plaintiffs in their portions of the July 28, 2021 letter (Dkt. 181). Plaintiffs’ portions consist of 13 pages and 54 case citations. Plaintiffs had not previously identified this authority in meet-and-confer discussions. For its part, Defendant had indicated in such discussions, including the final discussion on July 9, 2021, that it was relying on prior protective orders from Judge Caproni and model protective orders.

Accordingly, Defendant respectfully requests that this Court grant its request for leave to file Exhibit A, so that the Court can consider the authority contained therein.

Respectfully submitted,

s/ Matthew W. Lampe
Matthew W. Lampe

Enclosure

cc: All counsel of record